

IRV MAZE JEFFERSON COUNTY ATTORNEY



February 23, 2005

Elizabeth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40601

RE: Case No. 2004-00507 - Application of LG&E/KU Certificate of Convenience and Necessity

Dear Ms. O'Donnell:

Please find enclosed an original and ten (10) copies of a Petition to Intervene in the above styled docket on behalf of Louisville/Jefferson County Metro Government. As the Petition states, the Jefferson County Attorney is the legal advisor to Metro Government.

Upon the Commission's order and at your convenience, we would appreciate your office providing an updated service list.

Sincerek

N. Scott Lilly

Second Assistant County Attorney

NSL/tws

Enclosures

cc: Counsel of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

Joint Application of Louisville)	CASE No. 2004-00507
Gas & Electric Company and)	
ntucky Utilities Company)	
For a Certificate of Convenience)	
nd Necessity, and a Site Compatibility)	
Certificate for the Expansion of the)	
Trimble County Generating Station)	

<u>PETITION TO INTERVENE</u> <u>OF</u> LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT

Louisville/Jefferson County Metro Government, by counsel, pursuant to 807 KAR 5:001, Section 3(8), petitions for full intervention in the above captioned proceeding and in support thereof states as follows:

- 1. The Applicant, Louisville/Jefferson County Metro Government, is a municipal corporation organized pursuant to KRS 67(C). The population within the boundaries of the Applicant is approximately 693,000 substantially all of which represent residential and business customers of Louisville Gas & Electric Company ("LG&E"). The purpose of Louisville/Jefferson County Metro Government intervening in this proceeding is to participate in the determination of the need and basis for and the cost of constructing a second generating unit at the Trimble County Station and the impact it will have on its citizens and business customers.
- 2. The issues in this docket may have a significant impact on the rates Louisville/Jefferson County Metro Government and its citizens pay to LG&E for electric service.

3. Louisville/Jefferson County Metro Government and the residential and business customers residing therein cannot be adequately represented by any existing party. The Applicant intends to play a constructive role in this proceeding and its participation will not complicate, delay or disrupt the proceeding. The Applicant is aware of the procedural schedule adopted by the Commission and states that it does not intend to submit initial data requests to LG&E.

4. The Jefferson County Attorney is the legal advisor to Louisville/Jefferson County Metro Government and is authorized to represent it in this proceeding. Service of all documents, orders and other filings shall be made on the Jefferson County Attorney at the following address:

Irv Maze, Esq., Jefferson County Attorney
N. Scott Lilly, Esq., Second Assistant Jefferson County Attorney
Hall of Justice, Second Floor
600 West Jefferson Street
Louisville, KY 40202

WHEREFORE, Louisville/Jefferson County Metro Government requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

Irv Maze, Esq.

Jefferson County Attorney

N. Scott Lilly

Second Assistant County Attorney

Hall of Justice, Second Floor

600 West Jefferson Street

Louisville, KY 40202

Counsel for Louisville/Jefferson County Metro Government

CERTIFICATE

It is hereby certified that a copy of the foregoing was served by mailing a true and correct copy, by regular United States mail, to the following persons this day of February, 2005.

Kendrick R. Riggs, Esq.
J. Gregory Cornett, Esq.
Ogden Newell & Welch PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202

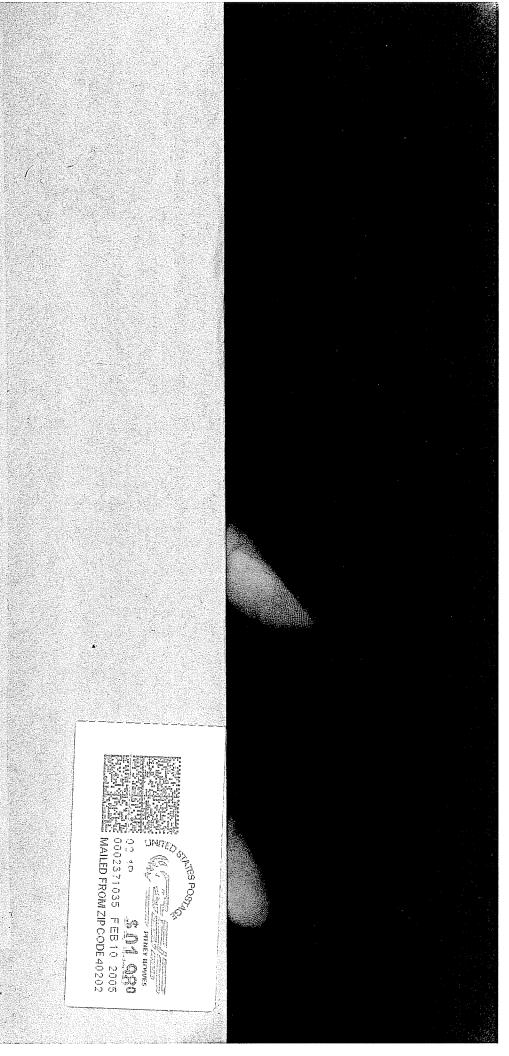
Elizabeth E. Blackford, Esq. Assistant Attorney General 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Robert M. Watt III Stoll, Keenon & Park, LLP 300 West Vine Street #2100 Lexington, Kentucky 40507-1801 Elizabeth L. Cocanougher LG&E Energy LLC 220 West Main Street Box 32010 Louisville, Kentucky 40232

Kent W. Blake Director - State Regulation and Rates LG&E Energy LLC 220 West Main Street Box 32010 Louisville, Kentucky 40232

rv Maze

Jefferson County Attorney



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LOUISVILLE, KY 40202

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COMMISSION COMMISSION

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission